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Attorney for Ricky James Jr. Salas Santos

IN THE UNITED STATES DISTRICT COURT
FOR THE TERRITORY OF GUAM

UNITED STATES OF AMERICA,)	CR 20-00021
)	
Plaintiff,)	UNOPPOSED MOTION TO
vs.)	CONTINUE TRIAL AND
)	MOTIONS DEADLINE
)	PURSUANT TO 18 U.S.C. § 3161
RICKY JAMES JR. SALAS SANTOS,)	
)	
Defendant.)	
_____)	

Ricky James Jr. Salas Santos, through counsel, respectfully moves the Court for an order continuing the current briefing and trial schedule for approximately 90 days. This motion is made pursuant to 18 U.S.C. § 3161 as the discovery process is not complete and additional time is needed in order to provide effective assistance of counsel. Assistant United States Attorney, Rosetta San Nicolas, does not object to this motion.

This motion is made because the Defense will be propounding supplemental discovery requests to include: reports and photographs relating to the use of clue spray; handwritten notes of agents and officers involved in alleged surveillance of Mr. Santos; the laboratory results for DEA Exhibits 6 9 and 12 14; *Brady*, *Giglio*, and

Henthorn material; records relating to K-9 searche(s) and K-9 records relating to training and certifications; among other things.

As a result, the Defense is not able to meaningfully prepare motions or prepare for trial. In order to accommodate the time need to complete the supplemental discovery request, review the materials, complete needed investigation, and prepare motions, Mr. Santos requests that the Court set all motions for filing in approximately 90 days. Ninety days is also requested because counsel for the United States will be unavailable between late December and early January.

The ends of justice outweigh the best interest of the public and Mr. Santos in a speedy trial. Failure to grant the requested continuance would deny Mr. Santos effective assistance of counsel and unreasonably deny his and defense counsel the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

DATED: Mongmong, Guam, October 15, 2020.

/s/



Briana E. Kottke
Assistant Federal Public Defender
District of Guam

Attorney for Ricky James Jr. Salas Santos